1 2 3 4 5	GEOFFREY A. HANSEN, Acting Federal Public Defender MANUEL U. ARAUJO Assistant Federal Public Defender 160 West Santa Clara Street, Suite 575 San Jose, CA 95113 Telephone: (408) 291-7753 Counsel for Defendant TULUD	EÒËZSÒÖÄÄGEFHEFHE
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7	IN THE UNITED STATES DISTRICT COURT	
8	FOR THE NORTHERN DISTRICT OF CALIFORNIA	
9	SAN JOSE DIVISION	
10		
11	UNITED STATES OF AMERICA,) No. CR -12-00408 - DLJ (PSG)
12	Plaintiff,) STIPULATION TO CONTINUE
13	v.) STATUS HEARING TO MARCH 7,) 2013; [] ORDER
14	MELQUIADEZ TULUD,) 2013, [] ORDER)
15	Defendant.) HONORABLE D. LOWELL JENSEN
16		,
17	STIPULATION	
18		
19	Defendant and the government, through their respective counsel, subject to the court's	
20	approval, hereby stipulate that the Court continue the status hearing in the above-captioned	
21	matter, presently scheduled for February 14, 2013, at 9:00 a.m., to March 7, 2013, at 9:00 a.m.	
22	The reason for the stipulation is as follows. The government has provided discovery and the	
23	defense has reviewed it. The discovery includes a number of spread sheets regarding the loss	
24	amount. The parties have engaged in discussions regarding a settlement of the matter, and have	
25	reached a tentative agreement which needs to proceed along the United States Attorney's	
26	approval process. Defense counsel will need to review and discuss the anticipated plea	
	Stipulation to Continue Status Hearing; [] Order No. CR 12 00408 DI L(PSC)	1

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1	agreement and its terms once the government makes its final plea offer. It is anticipated that an		
2	additional three weeks will be necessary to complete the process and/or complete any additional		
3	investigation. Mr. Tulud lives in Kern County, and he must travel by public transportation.		
4	The parties further agree and stipulate that time should be excluded from and including		
5	February 14, 2013, through and including March 7, 2013, to provide counsel reasonable time to		
6	prepare, pursuant to Speedy Trial Act, 18 U.S.C. §3161(h)(7)(A) and (B)(iv). Accordingly, the		
7	United States and the defendant agree that granting the requested exclusion of time will serve the		
8	interest of justice and outweigh the interest of the public and defendant in a speedy trial.		
9	Dated: February 11, 2013		
10	MANUEL ARAUJO,		
11	Assistant Federal Public Defender		
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13	Dated: February 11, 2013		
14	MEREDITH J. EDWARDS, Assistant United States Attorney		
15	Assistant Office States Attorney		
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	Stipulation to Continue Status Hearing; [] Order		

No. CR-12-00408 - DLJ (PSG)

[] ORDER Good cause appearing and by stipulation of the parties, it is hereby ordered that the status conference hearing in the above-captioned matter is continued from February 14, 2013, at 9:00 a.m., to March 7, 2013, at 9:00 a.m. It is further ordered that the period of delay from February 14, 2013, through and including February 11, 2013, be excluded for purposes of Speedy Trial Act computations pursuant to Title 18, United States Code, Sections 3161(h)(7)(A) and 3161(h)(7)(B)(iv). ŒÐ ŒÐ H Dated: HONORABLE D. LOWELL JENSEN, United States District Judge

Stipulation to Continue Status Hearing; [Order No. CR-12-00408 - DLJ (PSG)